



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

January 11, 1996

Brian Jones  
Environmental Superintendent  
Rayonier, Inc.  
P. O. Box 191  
Port Angeles, Washington 98362

RE: Dangerous waste inspection

Dear Mr. Jones:

On November 9, 1995, I performed a dangerous waste inspection at your facility. At the time of the inspection your mill appeared to be in compliance with Chapter 173-303 WAC including the land disposal restrictions. Your facility is classified as a large quantity generator and is regulated by the full extent of the regulations for generators. From the amount of hazardous waste generated in 1994, your status could change from a large quantity generator to a medium or small quantity generator. However, you may want to keep all items that you are required to have as a large quantity generator in place. Your company's reduction in the generation of hazardous waste related to the use of nonpetroleum solvents in the part washers is noted.

If you should have any questions, please call me at (360)407-6940.

Sincerely,

Don Nelson, P.E.  
Industrial Section  
Department of Ecology

cc: Arlene Army, Ecology

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**WASHINGTON STATE DEPARTMENT OF ECOLOGY**

**SOLID AND HAZARDOUS WASTE PROGRAM**

**INSPECTION REPORT**

1. Name and Address of Entity: ID Number: WAD 000490169

Rayonier, Inc.  
P. O. Box 191  
Port Angeles, Washington 98362

Date and Time of Inspection:  
November 9, 1995  
0930 - 1530

Phone Number and Contact:

Paul Perlwitz (360) 457-2442

Date of Inspection Report:

January 9, 1996


Type of Inspection and Reason for Inspection:

Scheduled - Generator

The company has changed their part washer solvents from a petroleum based to an orange oil based, a non hazardous waste. By this change, the company has reduced the amount of dangerous waste generated. Through this waste minimization and recycling there was a 86 % reduction in 1994 compared to the waste generated in 1993.

Inspection Conducted By:

Don Nelson

  
Signature

## 2. Description of Facility, Wastes Generated

1992

A total of 6,620 pounds of contaminated debris with trace lead in it was transported by Chemical Waste Management, (ILD 099202681), to the Chemical Waste Management of NW, (ORD089452353), TSD facility in Arlington, Oregon for final disposal in 1992.

A total of 5 pounds of waste hardening compound containing sodium cyanide, (55%), barium carbonate, (30%), and nonhazardous material, (15%); a total of 459 pounds of waste pesticide -2,4 dichlorophenoxyacetic acid (5 - 10%) in water; a total of 2020 pounds of waste hydraulic oil containing 2 ppm chromium and 5- 8 ppm Aroclor; a total of 8,840 pounds of waste paint thinner - ethylbenzene (<5%) xylene(25%), ethanol(25%), petroleum naphtha with lead(<100 ppm), and paint sludge; and 9,800 pounds of waste oil designated as dangerous wastes was transported by Resource Recovery Company, (WAD061672812) of Seattle, Washington to Chempro/Burlington Environmental, (WAD000812909), of Seattle, Washington for final disposal in 1992.

A total of 7,990 pounds of acetone, ethyl benzene, methyl isobutyl ketone, toluene, xylenes, and paint related material and a total of 8,398 pounds of mineral spirits, xylene, perchloroethylene, 1-1-1 trichloroethane, toluene, ethyl benzene, used for parts washing was transported by Safety Kleen Corp., (WAD000712059), to their TSD facility in Auburn, Washington for final disposal in 1992 by Rayonier, Inc.

1993

A total of 2,364 pounds of acetone, ethyl benzene, methyl isobutyl ketone, toluene, xylenes, and paint related material was transported by transporter No. 1 Safety Kleen Corp., (WAD000712059) of Auburn, Washington to transporter No. 2, Safety-Kleen Corp. (ORD98176624) to transporter No. 3, SLT Express, (UTD981552425) to transporter No. 4, Safety-Kleen Corp, (ILD051060408) to transporter No.5, JB Hunt Special Commodities, (ARD981908551) to transporter No. 6 (Schneider Tank Lines, (WID980904742) to the Safety-Kleen TSD facility in Newcastle, Kentucky, (KYD053348108), for final disposal.

A total of 1,153 pounds of acetone, ethyl benzene, methyl isobutyl ketone, toluene, xylenes, and paint related material was transported by transporter No. 1, Safety Kleen Corp., (WAD000712059), in Auburn, Washington to Safety-Kleen Corp.,(ORD981766124), transporter No. 2 to transporter No. 3, SLT Express, Inc., (UTD981552425) Safety-Kleen, Corp, (TXD077603371) of Denton, Texas for final disposal at their TSD facility in Denton, TX.

A total of 6,726 pounds of mineral spirits, C8+ aromatics(12%), xylene, 1-1-1 trichloroethane, toluene, ethyl benzene, used for part washers was transported by Safety-Kleen, (WAD000712059), of Auburn Washington to their TSD facility in Auburn, Washington for final disposal.

A total of 1,945 pounds of mineral spirits, C8+ aromatics(12%), xylene, 1-1-1 trichloroethane, toluene, ethyl benzene, used for part washers was transported by Safety-Kleen, (ILD984908202), to their TSD facility, (WAD000712059) in Auburn, Washington for final disposal.

1994

A total of 1,672 pounds of mineral spirits, Cadmium (<100ppm), lead (<500 ppm), benzene (<50 ppm) 1-1-1 trichloroethane,(>0.5%), tetrachloroethylene, (>70 ppm), toluene, xylene, used for parts washing was transported by Safety Kleen Corp., (WAD000712059) in Auburn, Washington, to their TSD facility (ILD984908202) for final disposal.

3. Description of Inspection

At approximately 930 hours I went over the dangerous waste inspection checklist and company's records. The paper work was finished and we toured the site. At 1500 I conducted a exit interview and exited the facility at 1530.

4. Special Considerations

The company appeared to be in compliance with all requirements of Chapter 173-303. Their manifests were in order with the proper LDR form attached.

5. Attachments

- i. Form 4 Generator Annual Dangerous Waste Report for 1992, 1993, and 1994.
- ii. Land disposal restriction forms were attached applicable manifest form.

6. Summary of Violations

The company is a large quantity generator. They had all of the training and safety plans required by Chapter 173-303 WAC. All paper work appeared to be well organized and met the intent of Chapter 173-303 WAC.